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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**  
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10 UNITED STATES OF AMERICA, )  
11 )  
Plaintiff, )  
12 )  
v. ) 2:09-CR-0173-PMP-PAL  
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Defendants.

**SECOND BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

The United States of America, by and through Daniel G. Bogden, United States Attorney for the District of Nevada, and Lucas M. Foletta, Assistant United States Attorney, hereby files the following Second Bill of Particulars for Forfeiture of Property.

The Criminal Indictment seeks forfeiture of properties pursuant to Title 17, United States Code, Section 506(b); Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 2323(b); and Title 21, United States Code, Section 853. In addition to the properties listed in the forfeiture allegations, the United States hereby gives notice that the following properties are subject to forfeiture:

1. IGT gaming program "CleopatraII" GK001927 (1 of 2);
2. IGT gaming program "CleopatraII" GK001927 (2 of 2);
3. IGT gaming program "King Cheetah" GK001217 (1 of 2);

4. IGT gaming program "King Cheetah" GK001217 (2 of 2);
5. IGT gaming program "Terminator Cyber Spin" GK001844 (1 of 2);
6. IGT gaming program "Terminator Cyber Spin" GK001844 (2 of 2);
7. IGT gaming program "Pharaohs Gold" GK001558 (1 of 3);
8. IGT gaming program "Pharaohs Gold" GK001558 (2 of 3);
9. IGT gaming program "Pharaohs Gold" GK001558 (3 of 3);
10. IGT gaming program "Aztech Temple" GK001510 (1 of 3);
11. IGT gaming program "Aztech Temple" GK001510 (2 of 3);
12. IGT gaming program "Aztech Temple" GK001510 (3 of 3);
13. IGT gaming program "Coyote Moon" GK001232 (1 of 3);
14. IGT gaming program "Coyote Moon" GK001232 (2 of 3);
15. IGT gaming program "Coyote Moon" GK001232 (3 of 3);
16. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Latino Machino" (1 of 3);
17. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Latino Machino" (2 of 3);
18. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Latino Machino" (3 of 3);
19. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Lion Dance" GK002092 (1 of 4);

20. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Lion Dance" GK002092 (2 of 4);
21. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Lion Dance" GK002092 (3 of 4);
22. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Lion Dance" GK002092 (4 of 4);
23. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Bombay" (1 of 3);
24. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Bombay" (2 of 3);
25. IGT conversion kit containing: button wire harness assembly, mother board, E2 chip, 044 CPU board, and Flash board described as "Bombay" (3 of 3);
26. Button assembly received from Southeast Gaming, Inc.;
27. 8 each 044 CPU boards returned from Southeast Gaming, Inc.;
28. Programmer received from FE Electronic;
29. DVD-R containing IGT programs received from Southeast Gaming, Inc.;
30. IGT gaming machine, serial number 1073240;
31. IGT gaming machine, serial number 886066;
32. IGT gaming machine, serial number 1053178;
33. IGT gaming machine, serial number 1073234;
34. IGT gaming machine, serial number 924295;
35. IGT gaming machine, serial number 905366;
36. IGT gaming machine, serial number 933498;

37. IGT gaming machine, serial number 588607;
38. IGT gaming machine, serial number 1036990;
39. IGT gaming machine, serial number 1073233;
40. IGT gaming machine, serial number 541838;
41. IGT gaming machine, serial number 485423;
42. IGT gaming machine, serial number 948309;
43. IGT gaming machine, serial number 1073241;
44. IGT gaming machine, serial number 85431;
45. IGT gaming machine, serial number 973161;
46. IGT gaming machine, serial number 933499;
47. IGT gaming machine, serial number 485410;
48. IGT gaming machine, serial number 9073237;
49. IGT gaming machine, serial number 1053177;
50. IGT gaming machine, serial number 9073238;
51. IGT gaming machine, serial number 1073230;
52. IGT gaming machine, serial number 1036989;
53. IGT gaming machine, serial number 834460;
54. IGT gaming machine, serial number 549559;
55. IGT gaming machine, serial number 1073232;
56. IGT gaming machine, serial number 1036979;
57. IGT gaming machine, serial number 769105;
58. IGT gaming machine, serial number 769122;
59. IGT gaming machine, serial number 1073235;
60. IGT gaming machine, serial number 769138;
61. IGT gaming machine, serial number 1073239;
62. IGT gaming machine, serial number 917238;

63. IGT gaming machine, serial number 1036987;
64. IGT gaming machine, serial number 588608;
65. IGT gaming machine, serial number 1036992;
66. IGT gaming machine, serial number 1017515;
67. Computer, Dell PC, serial number GR2RR21;
68. Computer, Dell PC, serial number G1MQR21;
69. Computer, Dell PC, serial number B7RLG41;
70. Computer, Dell PC, serial number DNJYQ21;
71. Cell phone, Cingular Treo, serial number PTCG0B36M02T;
72. 7.2 Meg DSC-W55 Sony Cybershot;
73. USB Memorex 512MB;
74. Dell PC, serial number GX2062400MT-06;
75. SeaGate external hard drive, serial number 5LY24P2F;
76. 164 miscellaneous CD's and DVD's;
77. 19 each circuit boards;
78. 1 USB and 1 Sandisk;
79. 3 boxes of slot machine glass;
80. Soldering machine A014159;
81. Miscellaneous EEPROM's;
82. 15 circuit boards in box;
83. 17 wire harnesses;
84. Miscellaneous pieces of slot machine glass;
85. Bellan USB 802.11G-54MBPS / 8 CD's;
86. IGT gaming machine, serial number 1256068;
87. IGT gaming machine, serial number 1184445;
88. IGT gaming machine, serial number 1184396;

- 1 89. Aoyue BGA9000A bench-top rework station;
- 2 90. Microdia 20GB compact flash card;
- 3 91. Sandisk extreme IV 4.0GB compact flash card;
- 4 92. Fuji film DPC-64 picture card;
- 5 93. Sony 2GB SD card, serial number MSX-M2GN-E418Z1B;
- 6 94. Sony 256MB SD card, serial number MSX-M256N-K327Y1A;
- 7 95. Sony 32MB SD card, serial number MSH-M32-I41350B;
- 8 96. 10 CD-R's for turbo flash gang programmer;
- 9 97. 5 miscellaneous CD-R's;
- 10 98. IGT serial plates;
- 11 99. Hard drive, serial number X1C317DF;
- 12 100. Hard drive, serial number K1HNC7TH;
- 13 101. Hard drive, serial number NN11T491BFEY;
- 14 102. 20GB Fujitsu hard drive, serial number NN11T471BCHO;
- 15 103. Apple Iphone, model A1241;
- 16 104. 10 each EEPROMS;
- 17 105. 5 CD-R's found in safe;
- 18 106. Internal hard drive, serial number 5FBD9A68;
- 19 107. Hitachi Travelstar 20GB hard drive, serial number Q1G38Z5B, Kiosk micro  
20 chip, Microdia 20GB compact flash, USB device;
- 21 108. USB modem for MacBook, serial number E02CA10830720101;
- 22 109. Computer, key R4KMQ-M3WDG-D7TGG- C798G-C92WG;
- 23 110. Computer, key PX24D-29FFY-2MDPG-G3VX9-WGMRJ;
- 24 111. Computer, key FJXPG-2Z77G-DEH2C-VRGCC-P7JX3;
- 25 112. Computer, key V3GGB-Y4WC8-V3K8Q-CJXW4-WTG8M;
- 26 113. Computer, serial number 95085H76106Q44000174;

114. Computer, serial number E8223124111Q4400014900;
115. Computer, key P3DYX-CCXMP-DDTCD-DVGWW-TCXXQ;
116. Computer, "Titan";
117. Computer, with "Spire" and "Super Rock" components;
118. IGT game theme prints;
119. Box of IGT labels;
120. IGT blueprints;
121. Flash card reader;
122. SIMM card reader;
123. Intelligent universal programmer;
124. Martin Hot-Reball-03, serial number HR03-03077;
125. Azkoyen coin validator programmer (1 of 2);
126. Azkoyen coin validator programmer (2 of 2);
127. 2 Advantach Equipment Lab Tool-T480 turbo flash gang programmers with  
flash board;
128. MacBook Air, serial number W88131F018X;
129. HP laptop computer, serial number SL399130;
130. Suitcase programmer;
131. Safe (empty);
132. 27.03 LVL (\$55.13 USD) found in safe; and
133. a criminal forfeiture money judgment up to \$5,000,000.00.

If the \$5,000,000.00 subject to forfeiture pursuant to Title 17, United States Code, Section 506(b); Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 2323(b); and Title 21, United States Code, Section 853, as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been place beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any properties of the defendant up to \$5,000,000.00 in United States Currency.

All pursuant to Title 17, United States Code, Section 506(b); Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 2323(b); and Title 21, United States Code, Section 853(p).

Dated this 4th day of May, 2010.

Respectfully submitted,

DANIEL G. BOGDEN  
United States Attorney

/s/ Lucas M. Foletta  
LUCAS M. FOLETTA  
Assistant United States Attorney



1 **PROOF OF SERVICE**

2 I, Jacqueline L. Peltier, certify that the following individuals were served on May 4, 2010, by  
3 the below identified method of service with copies of the Second Bill of Particulars for Forfeiture:

4 E-mail/ECF

5 Michael Pariente  
6 The Pariente Law Firm, P.C.  
7 330 S. Third St., Suite 1075  
8 Las Vegas, NV 89101  
9 Email: Michael@parientelaw.com  
10 *Counsel for Henry Mantilla*

11 Mace J. Yampolsky  
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16 *Counsel for Rodolfo Rodriguez Cabrera*

17 DATED this 4<sup>th</sup> day of May, 2010.

18 /s/Jacqueline L. Peltier  
19 JACQUELINE L. PELTIER  
20 Paralegal Specialist  
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